

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:
RIC F. MALIK,
Debtor

Chapter 7
Case No. 23-03241-ESL7

RECEIVED AND FILED
PRO SE UPLOAD TOOL
05/23/2025- 12:56 PM
USBC
(WRT)

**NOTICE OF FILING AND REQUEST FOR JUDICIAL NOTICE OF
CONTINUING STAY VIOLATION**

NOW COMES the Debtor, **Ric F. Malik**, appearing **pro se**, and respectfully notifies this Honorable Court of newly obtained evidence that the attorneys for Earl and Tama Geertgens are continuing litigation activity in violation of the automatic stay imposed by 11 U.S.C. § 362.

On **May 5, 2025**, counsel for co-defendant **Andrew Malik** prepared a **Motion to Quash Subpoenas** filed by **Mark Molz, Esq.**, in the Superior Court of New Jersey, in connection with **Docket No. BUR-L-1741-23**. Attached to that motion is a copy of the subpoena served by the Geertgens' attorneys, which continues to **name the Debtor, Ric F. Malik**, in direct contravention of the automatic stay.

Excerpts from the Proposed Subpoena

The subpoena requests documents and information explicitly relating to the Debtor, including:

“All documents referring or relating to Ric Malik and/or Moorestown Construction, LLC.”

“All communications between you and Ric Malik regarding any project, transfer of assets, business operations, or payments from 2019 to the present.”

“All documents showing payments to or from Ric Malik, including checks, transfers, invoices, or cash receipts.”

“Any photographs, emails, text messages, or other materials showing the presence, participation, or involvement of Ric Malik in any project performed by MC Remodeling, LLC.”

These post-petition discovery demands directly involve the Debtor and constitute an ongoing attempt to litigate issues central to the Debtor's bankruptcy case—outside of this Court's jurisdiction and in violation of the automatic stay.

Grounds for Judicial Notice and Further Action

This document is further evidence that:

1. The civil litigation under **BUR-L-1741-23** is continuing against the Debtor, Moorestown Construction, LLC, and his family members and affiliated businesses.
2. The litigation explicitly identifies **Debtor Ric F. Malik by name** in ongoing discovery efforts and subpoenas.
3. The continued use of the Debtor's name in **post-petition subpoenas** constitutes a **willful violation of the automatic stay** under **11 U.S.C. § 362(a)(1), (a)(3), and (a)(6)**.

The intent behind these discovery requests is to indirectly enforce a prepetition judgment, extract financial information about the Debtor, and pursue litigation against the Debtor's family members as proxies for the Debtor—an outcome the Bankruptcy Code is designed to prevent.

Relief Requested

The Debtor respectfully requests that this Honorable Court:

- **Take judicial notice** of this document and its attachments, and
 - Consider it in support of the Debtor's pending or forthcoming:
 - **Motion to Extend the Automatic Stay**, and/or
 - **Motion for Sanctions for Willful Violation of the Automatic Stay**
-

Respectfully submitted,

Dated: May 5, 2025

Ric F. Malik

Pro Se Debtor

756 Vieques

Vieques, PR 00765

ricmalik3@gmail.com

(787) 530-7799

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:

RIC F. MALIK,

Debtor

Chapter 7

Case No. 23-03241-ESL7

**MOTION FOR SANCTIONS FOR WILLFUL VIOLATION OF THE
AUTOMATIC STAY UNDER 11 U.S.C. §§ 362(a), (k), AND 105(a)**

TO THE HONORABLE ENRIQUE S. LAMOUTTE, UNITED STATES BANKRUPTCY JUDGE:

NOW COMES Debtor **Ric F. Malik**, appearing pro se, and respectfully moves this Court, pursuant to **11 U.S.C. §§ 362(a), 362(k), and 105(a)**, for the entry of an order imposing sanctions against creditors **Earl and Tama Geertgens** and their attorneys for continued willful violations of the automatic stay.

I. BACKGROUND

1. The Debtor filed a voluntary petition under Chapter 7 on **October 6, 2023**.
2. Upon filing, the automatic stay arose under 11 U.S.C. § 362(a), halting all efforts to collect a prepetition judgment or enforce any claim against the Debtor or property of the estate.
3. Despite this, creditors Earl and Tama Geertgens initiated a second lawsuit on **September 12, 2023** under **Docket No. BUR-L-1741-23**, which has continued post-petition and now targets the Debtor's family members and businesses as proxy defendants.
4. On **May 5, 2025**, a **Motion to Quash Subpoenas** filed in that state action revealed that the creditors' attorneys served discovery subpoenas **naming the Debtor** in multiple requests, including:
 - "All documents referring or relating to Ric Malik and/or Moorestown Construction, LLC."
 - "All communications between you and Ric Malik regarding any project, transfer of assets, business operations, or payments from 2019 to the present."
 - "All documents showing payments to or from Ric Malik, including checks, transfers, invoices, or cash receipts."
5. A true and correct copy of that motion and subpoenas is attached to the Debtor's **Notice of Filing**, filed concurrently herewith as **Exhibit A**.

II. LEGAL STANDARD

Under **11 U.S.C. § 362(k)(1)**, an individual injured by a willful violation of the stay shall recover actual damages, including costs and attorneys' fees, and in appropriate circumstances, **punitive damages**.

A stay violation is willful if:

- The creditor **knew of the bankruptcy**, and
- **Intentionally committed an act** that violated the stay.
(*Fleet Mortgage Group, Inc. v. Kaneb*, 196 F.3d 265, 269 (1st Cir. 1999))

Intent to violate the stay is **not required**; it is sufficient that the actor knew of the bankruptcy and intentionally took the actions that violated the stay.

III. ARGUMENT

The Geertgens and their attorneys had actual knowledge of the Debtor's bankruptcy case since October 2023. Yet, they:

- Continued prosecuting the state court action;
- Served discovery subpoenas in **April and May 2025** that **explicitly name the Debtor**; and
- Sought personal, financial, and operational information involving the Debtor that is protected by the stay.

This conduct constitutes a **willful and repeated violation of 11 U.S.C. § 362(a)(1), (a)(3), and (a)(6)**. These subpoenas were:

- Directed at third parties to gain information about the Debtor;
- Part of ongoing litigation aimed at enforcing a prepetition judgment; and
- Calculated to circumvent the protections of the bankruptcy court.

The inclusion of the Debtor's name in subpoenas—months after the filing of the bankruptcy petition—proves that the violations are **not accidental** but deliberate.

IV. RELIEF REQUESTED

Debtor respectfully requests the Court to:

1. **Find** that the continued naming of Ric F. Malik in subpoenas served in Docket No. BUR-L-1741-23 constitutes a **willful violation of the automatic stay**;
2. **Enjoin** further discovery, enforcement, or litigation activity by Earl and Tama Geertgens and their counsel that references or targets the Debtor;

3. **Award sanctions** against Earl and Tama Geertgens and/or their counsel, including:
 - Actual damages (if any can be shown),
 - Reasonable costs incurred in responding to the violations, and
 - **Punitive damages** as warranted under § 362(k);
 4. Grant any other relief this Court deems just and proper, including referral to the Chapter 7 trustee for further enforcement.
-

Respectfully submitted,

Dated: May 5, 2025

Ric F. Malik

Pro Se Debtor

756 Vieques

Vieques, PR 00765

ricmalik3@gmail.com

(787) 530-7799

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

RIC F. MALIK,

Debtor

Chapter 7

Case No. 23-03241-ESL7

CERTIFICATE OF SERVICE

I, **Ric F. Malik**, hereby certify that on this day, I served a true and correct copy of the following documents:

- **Motion for Sanctions for Willful Violation of the Automatic Stay**, and
- **Notice of Filing and Request for Judicial Notice of Continuing Stay Violation**,
- **Exhibit A** (copy of the Motion to Quash Subpoenas filed by Mark Molz, Esq.)

upon the following parties:

Via CM/ECF Electronic Notification:

- **Wigberto Lugo-Mender**, Chapter 7 Trustee
Email: trustee@lugomender.com
- **Office of the United States Trustee**
Email: ustpregion21.hr.ecf@usdoj.gov
- **Charles P. Gilmore, Esq.**
O'Neill & Gilmore Law Office, LLC
Email: cpg@go-law.com
- **Warren S. Wolf, Esq.**
Goldberg & Wolf, LLC
Email: wwolf@goldbergwolf.com

I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 5, 2025

Vieques, Puerto Rico

/s/ Ric F. Malik

Ric F. Malik

Pro Se Debtor

756 Vieques

Vieques, PR 00765

ricmalik3@gmail.com

(787) 530-7799

LAW OFFICE OF

MARK J. MOLZ

1400 ROUTE 38 EAST, P.O. BOX 577
HAINESPORT, NEW JERSEY 08036
PHONE: (609) 267-8884
FAX: (609) 267-1281

MARK J. MOLZ*#
MARISA P. MOLZ

#ALSO MEMBER OF FL BAR
*ALSO MEMBER OF PA BAR

OF COUNSEL:
RICHARD R. DiStefano*

February 24, 2025

Our File#

Clerk, Law Division
Superior Court of New Jersey
Burlington County Court House
49 Rancocas Road
Mount Holly, New Jersey
Via eCourts

Re: Geertgens v. Malik, et al
Docket No. BUR-L-1741-23

Dear Sir/Madam:

Enclosed please find the original and one copy of Defendant's Notice of Motion, Brief and/or Certification and form of Order in the above captioned matter. Kindly file these documents and return a filed copy.

Kindly charge our firm Superior Court account number 140264 in the amount of \$50.00 to cover the filing fees of this submission.

Thank you for your consideration.

Very truly yours:

Mark J. Molz, Esq./s/
Mark J. Molz, Esquire

MJM/mpm

Encl.

Cc: Clients
Karen Murray, Esq.

MARK J. MOLZ, ESQUIRE
MARISA P. MOLZ, ESQUIRE
1400 RTE. 38 EAST, PO BOX 577
HAINESPORT, NEW JERSEY 08036
Attorney ID # 038271985
Attorney ID # 306392019
Telephone 609-267-8884
Facsimile 609-267-1281
Attorney for Defendant(s) Andrew Malik and MC Remodeling LLC

EARL GEERTGENS AND TAMA GEERTGENS	:	SUPERIOR COURT OF NEW JERSEY
	:	BURLINGTON COUNTY
	:	LAW DIVISION
Plaintiff(s)	:	DOCKET NO. BUR-L-1741-23
	:	
	:	CIVIL ACTION
v.	:	
	:	
RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK and MC REMODELING LLC	:	NOTICE OF MOTION TO QUASH SUBPEONAS
Defendant(s)	:	
	:	
	:	
	:	
	:	
	:	
	:	

TO: Karen Murray, Esq.
8 East Main Street
Moorestown, New Jersey 08057

Take notice that on March 14, 2025, at 9:00 in the forenoon or as soon thereafter as counsel may be heard Mark J. Molz, Esquire attorney for the Defendants Andrew Malik and MC Remodeling LLC shall move before a judge of the Superior Court at the Burlington County Courthouse, 49 Rancocas Road, Mt. Holly, New Jersey 08060 for an Order as follows:

1. Quashing the five (5) subpoenas dated February 17, 2025 (Exhibits 1-5) issued by Karen Murray, Esq. to Hamilton Building Supply, Apple Kitchens Inc., David Ramsay Cabinetmaker, Albert Ellis, and Edgewater Building Supply pursuant to Rule 1:9-2; and
2. Quashing the Amended Subpoena dated February 24, 2025 (Exhibit 6) issued by Karen Murray, Esq. to David Ramsay Cabinetmaker, pursuant to Rule 1:9-2; and
3. Sanctioning Plaintiff's Counsel for violating the Bankruptcy Stay; and

4. Granting reasonable attorney's fees and costs for the necessity of this application; and
5. Granting any other relief deemed equitable and just.

Take notice that unless a written response is received by the Clerk of the Superior Court, located at Burlington County Court House, 49 Rancocas Road, Mt. Holly, New Jersey 08060, the Judge may in his/her discretion grant all or part of the relief requested by the Plaintiff in this motion.

No oral argument is requested unless opposition is filed.

NOTICE TO LITIGANTS: IF YOU WANT TO RESPOND TO THIS MOTION YOU MUST DO SO IN WRITING. This written response shall be with the court. (Affidavits and certifications are documents filed with the court. In either document the person signing it swears to its truth and acknowledges that they are aware that they can be punished for not filing a true statement with the court. Affidavits are notarized and certifications are not.) If you would also like to submit your own separate requests in a motion to the judge you can do so by filing a cross-motion. Your response and/or cross-motion may ask for oral argument. That means you can ask to appear before the court to explain your position. However, you must submit a written response even if you request oral argument. Any papers you send to the court must be sent to the opposing side, either to the attorney if the opposing party is represented by one, or to the other party if they represent themselves.

The response and/or cross-motion must be submitted to the Court by a certain date. All motions, all enforcement motions (also known as motions for enforcement of litigants' rights, R.1:10-3) must be filed 16 days before the return date. (Since most motion days are Friday, motion papers must be filed on the Wednesday 16 days before.) Therefore, a response and/or cross motion must be filed 8 days (Thursday) before the (Friday) return date. Therefore, a response and/or cross-motion must be filed 8 days (Thursday) before the return date. If you mail in your papers you must add three days to the above time periods.

Response to motion papers send to the court are to be send to the following address: Superior Court of New Jersey 49 Rancocas Road, Mt. Holly, New Jersey 08060. Call the Division Manager's office at 265-5000 if you have any questions on how to file a motion, cross-motion or any response papers. Please note that the Division Manager's office cannot give you legal advice.

MARK J. MOLZ, ESQUIRE
ATTORNEY AT LAW

/s/ Mark J. Molz, Esq.

Dated: 2-24-25

Mark J. Molz, Esquire

CERTIFICATION OF MAILING

The undersigned certifies under oath and penalty of perjury that the originals of these moving papers are this day being sent to the Clerk of Court, and that true, complete copies of these moving papers are simultaneously being sent to all parties appearing in this action, via first-class mail and eCourts to the following addresses:

Karen Murray, Esq.
8 East Main Street
Moorestown, New Jersey 08057

MARK J. MOLZ, ESQUIRE
ATTORNEY AT LAW

/s/ Mark J. Molz, Esq.

Dated: 2-24-25

Mark J. Molz, Esquire

MARK J. MOLZ, ESQUIRE
 MARISA P. MOLZ, ESQUIRE
 1400 RTE. 38 EAST, PO BOX 577
 HAINESPORT, NEW JERSEY 08036
 Attorney ID # 038271985
 Attorney ID # 306392019
 Telephone 609-267-8884
 Facsimile 609-267-1281
 Attorney for Defendant(s) Andrew Malik and MC Remodeling LLC

EARL GEERTGENS AND TAMA GEERTGENS	:	SUPERIOR COURT OF NEW JERSEY
	:	BURLINGTON COUNTY
	:	LAW DIVISION
Plaintiff(s)	:	DOCKET NO. BUR-L-1741-23
	:	
	:	CIVIL ACTION
v.	:	
	:	
RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK and MC REMODELING LLC	:	ORDER
	:	
Defendant(s)	:	
	:	
	:	
	:	
	:	
	:	

THIS MATTER having been opened to the Court by Mark J. Molz, Esquire, on _____, 2025, and the Court having considered the oral argument of counsel if any, and for good cause shown;

IT IS THIS DAY OF , 2025; ORDERED AS follows:

1. The five (5) subpoenas dated February 17, 2025 issued by Karen Murray, Esq. to Hamilton Building Supply, Apple Kitchens Inc., David Ramsay Cabinetmaker, Albert Ellis, and Edgewater Building Supply are HEREBY QUASHED pursuant to Rule 1:9-2; and
2. The Amended Subpoena dated February 24, 2025 (Exhibit 6) issued by Karen Murray, Esq. to David Ramsay Cabinetmaker, is HEREBY QUASHED pursuant to Rule 1:9-2; and
3. Plaintiff's Counsel is hereby sanctioned for violating the Bankruptcy Stay; and

4. Reasonable attorney's fees and costs are granted based upon a certification of services to be submitted within 14 days by the Law Office of Mark J. Molz for the necessity of this application; and

IT IS FURTHER ORDERED that this Order shall be deemed effectuated upon all parties upon its upload to eCourts. Movant shall serve all parties not electronically served within seven (7) days of the date of this Order.

Hon. Eric Fikry, P.J. Cv.

() **OPPOSED**

() **UNOPPOSED**

MARK J. MOLZ, ESQUIRE
 MARISA P. MOLZ, ESQUIRE
 1400 RTE. 38 EAST, PO BOX 577
 HAINESPORT, NEW JERSEY 08036
 Attorney ID # 038271985
 Attorney ID # 306392019
 Telephone 609-267-8884
 Facsimile 609-267-1281
 Attorney for Defendant(s) Andrew Malik and MC Remodeling LLC

EARL GEERTGENS AND TAMA GEERTGENS	:	SUPERIOR COURT OF NEW JERSEY
	:	BURLINGTON COUNTY
	:	LAW DIVISION
Plaintiff(s)	:	DOCKET NO. BUR-L-1741-23
	:	
	:	CIVIL ACTION
v.	:	
	:	
RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK and MC REMODELING LLC	:	CERTIFICATION OF MARK J. MOLZ
	:	
Defendant(s)	:	
	:	
	:	
	:	
	:	
	:	

Mark J. Molz of full age hereby certifies as follows:

1. I am an attorney at law in the State of New Jersey and make this certification based upon facts within my personal knowledge.
2. Attached hereto as Exhibits 1-5 are five (5) subpoenas dated February 17, 2025 issued by Karen Murray, Esq. to Hamilton Building Supply, Apple Kitchens Inc., David Ramsay Cabinetmaker, Albert Ellis, and Edgewater Building Supply.
3. Exhibit 1 is a true copy of the subpoena issued to Hamilton Building Supply.
4. Exhibit 2 is a true copy of the subpoena issued to Apple Kitchens Inc.
5. Exhibit 3 is a true copy of the subpoena issued to David Ramsay Cabinetmaker.
6. Exhibit 4 is a true copy of the subpoena issued to Albert Ellis.

7. Exhibit 5 is a true copy of the subpoena issued to Edgewater Building Supply.
8. Exhibit 6 is a true copy of the amended subpoena dated February 24, 2025 issued to David Ramsey Cabinetmaker.
9. At page 3 of each of the subpoenas, Karen Murray, Esq. defines the “Malik Parties” which term is used in her requests:

“The requests below relate to all of your business transactions with any of the following:

Moorestown Construction, LLC, Moorestown Construction, MC Remodeling, LLC, MC Remodeling, Corp., Ric Malik, or Andrew Malik (referred to in this subpoena as the “Malik Parties”)

10. Ric Malik has filed for the Protection of the Bankruptcy Court.
11. Attached hereto as Exhibit 7 is a true copy of my letter dated October 17, 2023 which was filed in eCourts and served upon Ms. Murray. It contains the Notice of Bankruptcy Filing.
12. In addition, Ms. Murray’s clients are actively litigating an adversary action against Ric Malik in his Bankruptcy Case.
13. Ms. Murray has actual knowledge of the Bankruptcy Case and the automatic stay provisions.
14. The Notice attached as Exhibit 7 itself states:

“Creditors who violate the stay can be required to pay actual and punitive damages and attorney’s fees”.

15. In Assoc. of St. Croix Condo. Owners v. St. Croix, 682 F.2d 446, 448 (3d Cir. 1982), the Third Circuit Court of Appeals stated:

“The automatic stay is one of the fundamental debtor protections provided by the bankruptcy laws. It gives the debtor a breathing spell from his creditors. It stops all collection efforts, all harassment, and all foreclosure actions. It permits the

debtor to attempt a repayment or reorganization plan or simply to be relieved of the financial pressures that drove him into bankruptcy.”

16. No relief from the Stay has been sought by Karen Murray, Esq.
17. “Only the bankruptcy court with jurisdiction over a debtor's case has the authority to grant relief from the stay of judicial proceedings against the debtor.” Maritime Elec. Co., Inc. v. United Jersey Bank, 959 F.2d 1194 (1991) (citing Cathey v. Johns-Manville Sales Corp., 711 F.2d 60, 62-63 (6th Cir. 1983), *cert. denied*, 478 U.S. 1021, 92 L.Ed.2d 740 (1986)).
18. Karen Murray, Esq.’s issuance of subpoenas seeking information about Ric Malik violates the Automatic Stay Provision of the Bankruptcy Code.
19. It is clearly a collection effort.
20. It is clearly harassment since she knows that Ric Malik is subject to the automatic stay.
21. Accordingly, I request that the Subpoenas be quashed and that sanctions in the form of attorney’s fees and costs be granted against Karen Murray, Esq.

I hereby certify the foregoing statements made by me are true. I understand that if any of the foregoing statements made by are willfully false, I am subject to punishment.

Dated: February 24, 2025

/s/ Mark J. Molz, Esq.
Mark J. Molz, Esq.

Karen M. Murray, Esquire (#024571996)
LAW OFFICES OF KAREN MURRAY LLC
8 East Main St.
Moorestown, NJ 08036
(856) 778-4002
(856) 778-4008 (fax)
Attorneys for Plaintiffs, Earl and Tama Geertgens

EARL AND TAMA GEERTGENS, Plaintiffs, v. RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK; and MC REMODELING, LLC, Defendants.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY LAW DIVISION DOCKET NUMBER BUR-L-1741-23 SUBPOENA
--	---

TO:

Hamilton Building Supply
65 Klockner Rd.
Hamilton Township, NJ 08619

You are hereby commanded to attend and give testimony in the above named on matter on behalf of Earl and Tama Geertgens, by way of deposition upon oral examination at the LAW OFFICES OF KAREN MURRAY LLC, 8 EAST MAIN STREET, MOORESTOWN, NEW JERSEY 08057, on Wednesday, February 27, 2025 commencing at 2:00 p.m. and continuing until you are excused. Said deposition will be taken in accordance with R. 4:59-1(f), and R. 4:14-1, *et. seq.* of the New Jersey Rules of Court, before a person authorized by the laws of the State of New Jersey to administer oaths. The subpoenaed evidence shall not be produced or released until the date specified for the taking of the deposition and if the deponent is notified that a motion to quash the subpoena has been filed, the deponent shall not produce or release the subpoenaed evidence until ordered to do so by the court or the release is consented to by all parties to the action.



You are further instructed to **bring with you for inspection and copying** the originals of all documents within your possession, custody or control set at **Exhibit A** to this Subpoena.

Failure to appear according to the command of this Subpoena will subject you to a penalty, damages in a Civil Suit and punishment for contempt of Court.

Dated: February 17, 2025

/s/ Karen M. Murray, Esq.
KAREN M. MURRAY ESQ.

/s/ Michelle M. Smith
Michele M. Smith, Clerk of the Court

EXHIBIT A

DOCUMENT TO PRODUCE AT DEPOSITION:

The requests below relate to all of your business transactions with any of the following:

Moorestown Construction, LLC, Moorestown Construction, MC Remodeling, LLC, MC Remodeling, Corp., Ric Malik, or Andrew Malik

(referred to in this subpoena as the “**Malik Parties**”).

All requests are for transactions made between **January 1, 2021 and present**.

Documents to be produced:

- 1. Quotes, estimates, proposals, sales orders or contracts, between you and any of the Malik Parties.**
- 2. Invoices you issued to any of the Malik Parties.**
- 3. Address(es) where materials purchased by the Malik Parties were delivered.**
- 4. Payments received from any of the Malik Parties.**
- 5. E-mail, text message, or other written communications with any of the Malik Parties.**

Karen M. Murray, Esquire (#024571996)
LAW OFFICES OF KAREN MURRAY LLC
8 East Main St.
Moorestown, NJ 08036
(856) 778-4002
(856) 778-4008 (fax)
Attorneys for Plaintiffs, Earl and Tama Geertgens

EARL AND TAMA GEERTGENS, Plaintiffs, v. RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK, and MC REMODELING, LLC, Defendants.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY LAW DIVISION DOCKET NUMBER BUR-L-1741-23 SUBPOENA
--	---

TO:

Apple Kitchens, Inc.
513 S Lenola Rd.
Moorestown, NJ 08057

You are hereby commanded to attend and give testimony in the above named on matter on behalf of Earl and Tama Geertgens, by way of deposition upon oral examination at the LAW OFFICES OF KAREN MURRAY LLC, 8 EAST MAIN STREET, MOORESTOWN, NEW JERSEY 08057, on **Wednesday, February 27, 2025 commencing at 4:00 p.m.** and continuing until you are excused. Said deposition will be taken in accordance with R. 4:59-1(f), and R. 4:14-1, *et. seq.* of the New Jersey Rules of Court, before a person authorized by the laws of the State of New Jersey to administer oaths. The subpoenaed evidence shall not be produced or released until the date specified for the taking of the deposition and if the deponent is notified that a motion to quash the subpoena has been filed, the deponent shall not produce or release the subpoenaed evidence until ordered to do so by the court or the release is consented to by all parties to the action.



You are further instructed to **bring with you for inspection and copying** the originals of all documents within your possession, custody or control set at **Exhibit A** to this Subpoena.

Failure to appear according to the command of this Subpoena will subject you to a penalty, damages in a Civil Suit and punishment for contempt of Court.

Dated: February 17, 2025

/s/ Karen M. Murray, Esq.
KAREN M. MURRAY ESQ.

/s/ Michelle M. Smith
Michele M. Smith, Clerk of the Court

EXHIBIT A

DOCUMENT TO PRODUCE AT DEPOSITION:

The requests below relate to all of your business transactions with any of the following:

Moorestown Construction, LLC, Moorestown Construction, MC Remodeling, LLC, MC Remodeling, Corp., Ric Malik, or Andrew Malik

(referred to in this subpoena as the “**Malik Parties**”).

All requests are for transactions made between **January 1, 2021 and present**.

Documents to be produced:

1. **Quotes, estimates, proposals, sales orders or contracts, between you and any of the Malik Parties.**
2. **Invoices you issued to any of the Malik Parties.**
3. **Address(es) where materials purchased by the Malik Parties were delivered.**
4. **Payments received from any of the Malik Parties.**
5. **E-mail, text message, or other written communications with any of the Malik Parties.**

Karen M. Murray, Esquire (#024571996)
LAW OFFICES OF KAREN MURRAY LLC
8 East Main St.
Moorestown, NJ 08036
(856) 778-4002
(856) 778-4008 (fax)
Attorneys for Plaintiffs, Earl and Tama Geertgens

EARL AND TAMA GEERTGENS, Plaintiffs, v. RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK; and MC REMODELING, LLC, Defendants.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY LAW DIVISION DOCKET NUMBER BUR-L-1741-23 SUBPOENA
--	---

TO:

David Ramsay Cabinetmaker
310 Mill St.
Moorestown, NJ 08057

You are hereby commanded to attend and give testimony in the above named on matter on behalf of Earl and Tama Geertgens, by way of deposition upon oral examination at the LAW OFFICES OF KAREN MURRAY LLC, 8 EAST MAIN STREET, MOORESTOWN, NEW JERSEY 08057, on **Wednesday, February 27, 2025 commencing at 1:00 p.m.** and continuing until you are excused. Said deposition will be taken in accordance with R. 4:59-1(f), and R. 4:14-1, *et. seq.* of the New Jersey Rules of Court, before a person authorized by the laws of the State of New Jersey to administer oaths. The subpoenaed evidence shall not be produced or released until the date specified for the taking of the deposition and if the deponent is notified that a motion to quash the subpoena has been filed, the deponent shall not produce or release the subpoenaed evidence until ordered to do so by the court or the release is consented to by all parties to the action.



You are further instructed to bring with you for inspection and copying the originals of all documents within your possession, custody or control set at Exhibit A to this Subpoena.

Failure to appear according to the command of this Subpoena will subject you to a penalty, damages in a Civil Suit and punishment for contempt of Court.

Dated: February 17, 2025

/s/ Karen M. Murray, Esq.
KAREN M. MURRAY ESQ.

/s/ Michelle M. Smith
Michele M. Smith, Clerk of the Court

EXHIBIT A

DOCUMENT TO PRODUCE AT DEPOSITION:

The requests below relate to all of your business transactions with any of the following:

Moorestown Construction, LLC, Moorestown Construction, MC Remodeling, LLC, MC Remodeling, Corp., Ric Malik, or Andrew Malik

(referred to in this subpoena as the “**Malik Parties**”).

All requests are for transactions made between **January 1, 2021 and present**.

Documents to be produced:

1. **Quotes, estimates, proposals, sales orders or contracts, between you and any of the Malik Parties.**
2. **Invoices you issued to any of the Malik Parties.**
3. **Address(es) where materials purchased by the Malik Parties were delivered.**
4. **Payments received from any of the Malik Parties.**
5. **E-mail, text message, or other written communications with any of the Malik Parties.**

Karen M. Murray, Esquire (#024571996)
LAW OFFICES OF KAREN MURRAY LLC
8 East Main St.
Moorestown, NJ 08036
(856) 778-4002
(856) 778-4008 (fax)
Attorneys for Plaintiffs, Earl and Tama Geertgens

EARL AND TAMA GEERTGENS, Plaintiffs, v. RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK; and MC REMODELING, LLC, Defendants.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY LAW DIVISION DOCKET NUMBER BUR-L-1741-23 SUBPOENA
--	---

TO:

Albert Ellis, Inc.
124 Mill St.
Moorestown, NJ 08057

You are hereby commanded to attend and give testimony in the above named on matter on behalf of Earl and Tama Geertgens, by way of deposition upon oral examination at the **LAW OFFICES OF KAREN MURRAY LLC, 8 EAST MAIN STREET, MOORESTOWN, NEW JERSEY 08057**, on **Wednesday, February 27, 2025 commencing at 3:00 p.m.** and continuing until you are excused. Said deposition will be taken in accordance with R. 4:59-1(f), and R. 4:14-1, *et. seq.* of the New Jersey Rules of Court, before a person authorized by the laws of the State of New Jersey to administer oaths. The subpoenaed evidence shall not be produced or released until the date specified for the taking of the deposition and if the deponent is notified that a motion to quash the subpoena has been filed, the deponent shall not produce or release the subpoenaed evidence until ordered to do so by the court or the release is consented to by all parties to the action.



You are further instructed to **bring with you for inspection and copying** the originals of all documents within your possession, custody or control set at **Exhibit A** to this Subpoena.

Failure to appear according to the command of this Subpoena will subject you to a penalty, damages in a Civil Suit and punishment for contempt of Court.

Dated: February 17, 2025

/s/ Karen M. Murray, Esq.
KAREN M. MURRAY ESQ.

/s/ Michelle M. Smith
Michele M. Smith, Clerk of the Court

EXHIBIT A

DOCUMENT TO PRODUCE AT DEPOSITION:

The requests below relate to all of your business transactions with any of the following:

Moorestown Construction, LLC, Moorestown Construction, MC Remodeling, LLC, MC Remodeling, Corp., Ric Malik, or Andrew Malik

(referred to in this subpoena as the “**Malik Parties**”).

All requests are for transactions made between **January 1, 2021 and present**.

Documents to be produced:

1. **Quotes, estimates, proposals, sales orders or contracts, between you and any of the Malik Parties.**
2. **Invoices you issued to any of the Malik Parties.**
3. **Address(es) where materials purchased by the Malik Parties were delivered.**
4. **Payments received from any of the Malik Parties.**
5. **E-mail, text message, or other written communications with any of the Malik Parties.**

Karen M. Murray, Esquire (#024571996)
LAW OFFICES OF KAREN MURRAY LLC
8 East Main St.
Moorestown, NJ 08036
(856) 778-4002
(856) 778-4008 (fax)
Attorneys for Plaintiffs, Earl and Tama Geertgens

EARL AND TAMA GEERTGENS, Plaintiffs, v. RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK; and MC REMODELING, LLC, Defendants.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY LAW DIVISION DOCKET NUMBER BUR-L-1741-23 SUBPOENA
--	---

TO:

Edgewater Building Supply
704 Woodlane Rd.
Beverly, NJ 08010

You are hereby commanded to attend and give testimony in the above named on matter on behalf of Earl and Tama Geertgens, by way of deposition upon oral examination at the LAW OFFICES OF KAREN MURRAY LLC, 8 EAST MAIN STREET, MOORESTOWN, NEW JERSEY 08057, on **Wednesday, February 27, 2025 commencing at 12:00 p.m.** and continuing until you are excused. Said deposition will be taken in accordance with R. 4:59-1(f), and R. 4:14-1, *et. seq.* of the New Jersey Rules of Court, before a person authorized by the laws of the State of New Jersey to administer oaths. The subpoenaed evidence shall not be produced or released until the date specified for the taking of the deposition and if the deponent is notified that a motion to quash the subpoena has been filed, the deponent shall not produce or release the subpoenaed evidence until ordered to do so by the court or the release is consented to by all parties to the action.



You are further instructed to **bring with you for inspection and copying** the originals of all documents within your possession, custody or control set at **Exhibit A** to this Subpoena.

Failure to appear according to the command of this Subpoena will subject you to a penalty, damages in a Civil Suit and punishment for contempt of Court.

Dated: February 17, 2025

/s/ Karen M. Murray, Esq.
KAREN M. MURRAY ESQ.

/s/ Michelle M. Smith
Michele M. Smith, Clerk of the Court

EXHIBIT A

DOCUMENT TO PRODUCE AT DEPOSITION:

The requests below relate to all of your business transactions with any of the following:

Moorestown Construction, LLC, Moorestown Construction, MC Remodeling, LLC, MC Remodeling, Corp., Ric Malik, or Andrew Malik

(referred to in this subpoena as the “**Malik Parties**”).

All requests are for transactions made between **January 1, 2021 and present.**

Documents to be produced:

- 1. Quotes, estimates, proposals, sales orders or contracts, between you and any of the Malik Parties.**
- 2. Invoices you issued to any of the Malik Parties.**
- 3. Address(es) where materials purchased by the Malik Parties were delivered.**
- 4. Payments received from any of the Malik Parties.**
- 5. E-mail, text message, or other written communications with any of the Malik Parties.**

Karen M. Murray, Esquire (#024571996)
LAW OFFICES OF KAREN MURRAY LLC
8 East Main St.
Moorestown, NJ 08036
(856) 778-4002
(856) 778-4008 (fax)
Attorneys for Plaintiffs, Earl and Tama Geertgens

EARL AND TAMA GEERTGENS, Plaintiffs, v. RIC MALIK, MOORESTOWN CONSTRUCTION, LLC, ANDREW MALIK; and MC REMODELING, LLC, Defendants.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY LAW DIVISION DOCKET NUMBER BUR-L-1741-23 SUBPOENA (AMENDED)
--	---

TO:

David Ramsay Cabinetmaker
310 Mill St.
Moorestown, NJ 08057

You are hereby commanded to attend and give testimony in the above named on matter on behalf of Earl and Tama Geertgens, by way of deposition upon oral examination at the LAW OFFICES OF KAREN MURRAY LLC, 8 EAST MAIN STREET, MOORESTOWN, NEW JERSEY 08057, on **Wednesday, February 27, 2025 commencing at 1:00 p.m.** and continuing until you are excused. Said deposition will be taken in accordance with R. 4:59-1(f), and R. 4:14-1, *et. seq.* of the New Jersey Rules of Court, before a person authorized by the laws of the State of New Jersey to administer oaths. The subpoenaed evidence shall not be produced or released until the date specified for the taking of the deposition and if the deponent is notified that a motion to quash the subpoena has been filed, the deponent shall not produce or release the subpoenaed evidence until ordered to do so by the court or the release is consented to by all parties to the action.



You are further instructed to **bring with you for inspection and copying** the originals of all documents within your possession, custody or control set at **Exhibit A** to this Subpoena.

Failure to appear according to the command of this Subpoena will subject you to a penalty, damages in a Civil Suit and punishment for contempt of Court.

Dated: February 24, 2025

/s/ Karen M. Murray, Esq.
KAREN M. MURRAY ESQ.

/s/ Michelle M. Smith
Michele M. Smith, Clerk of the Court

EXHIBIT A

DOCUMENT TO PRODUCE AT DEPOSITION:

The requests below relate to all of your business transactions with any of the following:

Moorestown Construction, LLC, Moorestown Construction, MC Remodeling, LLC, MC Remodeling, Corp., Ric Malik, or Andrew Malik

(referred to in this subpoena as the "**Malik Parties**").

All requests are for transactions made between **January 1, 2021 and present**.

Documents to be produced:

- 1. Quotes, estimates, proposals, sales orders or contracts, between you and any of the Malik Parties.**
- 2. Invoices you issued to any of the Malik Parties.**
- 3. Address(es) where materials purchased by the Malik Parties were delivered.**
- 4. Payments received from any of the Malik Parties.**
- 5. E-mail, text message, or other written communications with any of the Malik Parties.**
- 6. Leases to any of the above referenced Malik Parties, or companies associated therewith.**

LAW OFFICE OF
MARK J. MOLZ

1400 ROUTE 38 EAST, P.O. Box 577
HAINESPORT, NEW JERSEY 08036
PHONE: (609) 267-8884
FAX: (609) 267-1281

MARK J. MOLZ*#
MARISA P. MOLZ

#ALSO MEMBER OF FL BAR
*ALSO MEMBER OF PA BAR

OF COUNSEL:
RICHARD R. DiSTEFANO*

October 17, 2023

Hon. Eric Fikry, J.S.C.
Superior Court of New Jersey
Burlington County Courts Facility
49 Rancocas Rd.
Mt. Holly, New Jersey 08060
Via eCourts

Re: Geertgens v. Malik, et al
Docket No. BUR-L-1741-23

Dear Judge Fikry:

Please be advised that this office has been retained by Andrew Malik and MC Remodeling LLC in connection with a levy that has been placed against his checking account. I understand that the Return of the Order to Show Cause is scheduled for October 19, 2023.

The debtor Ric Malik has filed a Petition in Bankruptcy Court under Chapter 7 and the automatic stay provisions apply. (Notice attached). This newest Complaint seeks to collect a judgment against Ric Malik and is stayed.

Please be guided accordingly.

Very Truly Yours,

Mark J. Molz, Esq./s/
Mark J. Molz, Esq.

MJM/mpm
Encl.

cc: Andrew Malik
Karen Murray, Esq.



Information to identify the case:	
Debtor 1:	RIC F MALIK
First Name Middle Name Last Name	
Debtor 2:	
(Spouse, if filing) First Name Middle Name Last Name	
United States Bankruptcy Court: District of Puerto Rico	Social Security number or ITIN: XXX-XX-XXXX EIN: - - - - -
Case number: 23-03241	Social Security number or ITIN: - - - - - EIN: - - - - - Date case filed for chapter: 7 10/6/23

Official Form 309B (For Individuals or Joint Debtors)

Notice of Chapter 7 Bankruptcy Case -- Proof of Claim Deadline Set

10/20

For the debtors listed above, a case has been filed under chapter 7 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtors or the debtors' property. For example, while the stay is in effect, creditors cannot sue, garnish wages, assert a deficiency, repossess property, or otherwise try to collect from the debtors. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although debtors can ask the court to extend or impose a stay.

The debtors are seeking a discharge. Creditors who assert that the debtors are not entitled to a discharge of any debts or who want to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadlines specified in this notice. (See line 9 for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

The staff of the bankruptcy clerk's office cannot give legal advice.

To help creditors correctly identify debtors, debtors submit full Social Security or Individual Taxpayer Identification Numbers, which may appear on a version of this notice. However, the full numbers must not appear on any document filed with the court.

Do not file this notice with any proof of claim or other filing in the case. Do not include more than the last four digits of a Social Security or Individual Taxpayer Identification Number in any document, including attachments, that you file with the court.

	About Debtor 1:	About Debtor 2:
1. Debtor's full name	RIC F MALIK	
2. All other names used in the last 8 years		
3. Address	Monte Carmelo Vieques, PR 00765	
4. Debtor's attorney Name and address	FREDERIC CHARDON DUBOS Frederic Chardon Dubos Law Office PO BOX 1797 PR Carolina, PR 00984-1797	Contact phone 787-908-2476 Email: fcdlaw2020@gmail.com
5. Bankruptcy trustee Name and address	WIGBERTO LUGO MENDER Wigberto Lugo Mender, CPA CENTRO INTERNACIONAL DE MERCADEO 100 CARR 165 SUITE 501 GUAYNABO, PR 00968-8052	Contact phone 787 707-0404 Email: trustee@lugomender.com

For more information, see page 2 >

